

From: Paul and Gill Goodman [REDACTED]
Sent: 06 August 2021 18:11
To: localplans@charnwood.gov.uk
Subject: Consultation on Local Plan 2021-37
Attachments: Loughborough Green Party Comments on Local Area Plan revised (2).pdf

Good afternoon,

Please find attached the reply from Loughborough Green Party to the Local Plan.

Thank you.

Paul Goodman

Loughborough Green Party Comments on Pre-Submission Draft of Charnwood Local Plan 2021-37

The Loughborough Green Party has numerous concerns regarding the Charnwood Local Plan. Much of this stems from the intention to build nearly 20,000 homes, mostly on green land, and generally too far from town centres to access them by walking. The plan describes major “sustainable urban extensions”, but in reality there is nothing sustainable about these. These developments will put strain on existing schools, even with some new primary schools planned, and on health and care provision.

The need for new housing is handed down by Government and is based on a standard methodology set out in National Planning Practice Guidance. The data used for this is out of date. Births no longer exceed deaths in the UK, as stated on page 19. The UK birth rate has been falling steadily for many years, and corona-virus has added to the number of deaths. It would be useful to see an explicit comment that Government calculation will result in building more homes than required. Already there is a net commuter outflow of over 11,000 per day from the Borough, mainly to Leicester, but also to Nottingham. This suggests that the real housing need is not in Charnwood, but in the cities. And the vast majority of residents travel to work by car, causing congestion and reducing air quality. It is inevitable that the planned significant increase in housing will exacerbate these problems. In order to find space for all this housing, in addition to the so-called sustainable urban extensions, significant housing developments will be imposed on the outlying settlements, with a disproportionate impact on Barrow upon Soar, Sileby and East Goscote.

A proportion of new homes should be affordable (where affordable rent is no more than 80 per cent of the local market rent and thus in reality with an inflating property market, not really affordable). It is conspicuous that there are no plans to build social housing that is required by the economically most disadvantaged.

The document claims it will ensure access to green spaces, but Charnwood refuses to designate any Local Green Spaces in the Borough that would properly protect them. Green Wedges exist but do not afford such protection, indeed the present plan sees building development on a Green Wedge. Covid has emphasised the importance of accessible local green spaces for health and wellbeing, as well as for the environment and wildlife. Building over such spaces as proposed at locations HA15, HA16, and HA17 cannot be justified; indeed, it conflicts with Charnwood’s own environmental policy.

The plan claims to support the achieving a carbon neutral Borough but in reality falls far short of this. Take for example the new housing to be built between now and 2037. All this housing will be with us in 2050 when all agree that the UK should be at net zero carbon emissions. All new housing should thus be built to this standard, combining ultra-high thermal insulation with solar PV and solar thermal water heating and heat pumps for space heating were required. The best the plan can offer is to “encourage” (not mandate) developers to aim for a 10% CO₂ reduction compared to Building Regulations. Note that the Building Regulations were last updated in 2016 and lag well behind those in other comparable countries. According to the UK Government Committee on Climate Change it is

best to “Build new homes to high standards to avoid costly retrofitting”. This seems not to be the Charnwood way; there has been a failure to understand the nature of high standards. The term “Energy Recovery” for the new facility at Newhurst Quarry near Shepshed is misleading; it is more properly known as a Waste Incineration. It is not a renewable or low carbon technology, as described in Table 7.

The intention is to move away from use of the car, towards walking, cycling and public transport. As part of this, new investments in dedicated cycle paths would be expected, but no specific plans have been made. Narrow streets such as in the older parts of Loughborough and Shepshed make it difficult to accommodate such cycle routes and thus more radical plans are required including converting present two way roads to one way plus a cycle path. EV charging points are to be delivered where new build occurs, but there are no plans for existing housing. It appears that the Council wishes to rely on developers for this infrastructure. The plan is rather vague regarding new road building. It is assumed that “improved connectivity and accessibility” is code for so called road improvements. Some new roads are mentioned including the new “strategic distributor road” connecting the A512 to the A6 south of Hathern. It is well established that new road developments result in overall increased traffic. How this will not result in increased pollution has not been spelt out.

Paragraph 8.38 states that mature trees are important and that their loss will be resisted except in “exceptional circumstances”. Charnwood Planning Department’s history of allowing developers to remove trees for their convenience and profit suggests that this commitment cannot be relied upon. The 10% net biodiversity gain associated with development is unlikely to be delivered in practice. The plan puts more emphasis on tree planting, than on protection of existing trees. The replacement of a tree with three new trees sounds good until it is realised that to compensate for lack of CO₂ capture in the medium term, many hundreds of saplings are required to replace a single mature tree. It would be useful for Charnwood to assess through detailed survey of the tree stock in the Borough, the extent to which CO₂ capture by trees is actually being lost.